

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In Re:)	Case No.: 23-00484
)	
BDC GROUP, INC.,)	Chapter 7 (Converted from Chapter 11)
)	
Debtor.)	Hon. Thad J. Collins
)	
EIN: 47-2908533)	NOTICE OF ZAYO GROUP'S COMPLIANCE
)	WITH THE COURT'S OCTOBER 02, 2024
)	RULING ON MOTION FOR CONTEMPT
)	
)	Hearing: October 29, 2024
)	Time: 10:30 a.m.
)	Location: Telephone Hearing

COMES NOW, Zayo Group, LLC, ("**Zayo**"), by and through its counsel of record in this case, (a) Jeffrey D. Goetz of the law firm of Dickinson, Bradshaw, Fowler & Hagen, P.C., and (b) Jordan A. Kroop and Jason Rosell of the law firm of Pachulski Stang Ziehl & Jones LLP, notifying the Court and parties in interest that:

1. On October 02, 2024, the Court issued its *Ruling on Motion for Contempt* [Docket No. 538] (the "**Contempt Order**"). Pursuant to the Contempt Order, the Court found that Zayo did not comply with that *Stipulated Order for Stay Relief and Other Matters* [Docket No. 361] and directed Zayo to "comply with the [Contempt Order], in full and with interest to reflect the ongoing delay."

2. On October 16, 2024, Zayo filed a *Notice of Appeal* [Docket No. 545] and thereby commenced an appeal of the Contempt Order. Notwithstanding the pending appeal of the Contempt Order, Zayo has complied with the Contempt Order.

3. On October 24, 2024, Zayo wired \$250,087.47 to the chapter 7 trustee pursuant to wire instructions provided by the chapter 7 trustee. The amount paid was calculated as follows:

Amount	243,317.51
Fed. Judgment Rate ¹	4.03%
Due Date	01/24/2024
Date of Ruling	10/02/2024
Interest	6,769.96
Total Due	250,087.47

4. For the avoidance of doubt, Zayo reserves all rights with respect to (a) the pending appeal, (b) all claims and defenses, including all setoff and recoupment rights with respect to any amounts owed to the Debtors, (c) all rights, claims, and defenses in connection with that certain *Application for Attorneys' Fees* [Docket No. 548], and (d) all rights, claims, and causes of action against Keystone Savings Bank and any of its affiliates, agents, and representatives.

Dated: October 24, 2024

RESPECTFULLY SUBMITTED,

/s/ Jeffrey D. Goetz

Jeffrey D. Goetz, Esq., AT#00002832
Dickinson Bradshaw Fowler & Hagen, P.C.
801 Grand Avenue, Ste. 3700
Des Moines, IA 50309-8004
515/246-5817
515/246-5808 FAX
jgoetz@dickinsonbradshaw.com

/s/ Jordan A. Kroop

Jordan A. Kroop, Esq., *Pro Hac Vice*
Jason Rosell, Esq., *Pro Hac Vice*
Pachulski Stang Ziehl & Jones LLP
780 Third Ave., 34th Floor
New York, NY 10017
212/561-7734
jkroup@pszjlaw.com
jrosell@pszjlaw.com

All future notices will be sent to the above address.

CERTIFICATE OF SERVICE: This document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing.

/s/ Brenda Mozena

¹ <https://www.casb.uscourts.gov/post-judgment-interest-rates-2024>